UNITED	STATES	DISTR	UCT	COU	RT
SOUTHE	RN DIST	RICT	OFN	EW	VORK

In Re: Methyl Tertiary Butyl Ether ("MTBE")

Products Liability Litigation

Master File No. 1:00 – 1898 MDL 1358 (VSB)

This Document Relates to:

New Jersey Department of Environmental Protection, et al. v. Atlantic Richfield Co., et al., No. 1:08-CV-00312-VSB

## STIPULATION AND [PROPOSED] ORDER

On or about September 28, 2018, the Court granted Plaintiffs' Unopposed Motion for Leave to File a Fifth Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, newly-added Defendants Lukoil North America LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil (collectively the "newly-added Lukoil Defendants"), and existing Defendants Lukoil Americas Corporation and Getty Petroleum Marketing Inc., that the newly-added Lukoil Defendants, Lukoil Americas Corporation and Getty Petroleum Marking Inc. shall have until November 30, 2018 in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: October 10, 2018

AGREED TO BY:					
AKIN GUMP STRAUSS HAUER & FELD LLP  KATHERINE M. KATCHEN					
Two Commerce Square					
2001 Market Street, Suite 4100					
Philadelphia, PA 19103					
(215) 965-1200					
Counsel for Newly-Added Lukoil Defendants					
MILLER & AXLINE, P.C.					
DUANE C. MILLER MICHAEL AXLINE 1050 Fulton Ave., Suite 100 Sacramento, CA 95825 (916) 488-6688 Counsel for plaintiff					
BLEAKLEY PLATT & SCHMIDT, LLP  MATTHEW G. PARISI One North Lexington Avenue White Plains, NY 10601 (914)949-2700 Counsel for Lukoil Americas Corporation & Getty Petrole	um Marketing Inc.				
SO ORDERED,					
Dated:, 2018					
HON. V	ERNON S. BRODERICK				

AGREED TO BY:	
AKIN GUMP STRAUSS HAUER & FELD LLP	
KATHERINE M. KATCHEN	
Two Commerce Square	
2001 Market Street, Suite 4100 Philadelphia, PA 19103	
(215) 965-1200	
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,	
MILLER & AXLINE, P.C.	
Ist further files	
DUANE C. MILLER MICHAEL AXLINE	
1050 Fulton Ave., Suite 100	
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Counsel for plaintiff	
BLEAKLEY PLATT & SCHMIDT, LLP	
/s/	
MATTHEW G. PARISI	
One North Lexington Avenue	
White Plains, NY 10601	
(914)949-2700	Sambatha a Ta
Counsel for Lukoil Americas Corporation & Getty Petroleum M	arketing Inc.
SO ORDERED,	
So ciedads,	
Dated:, 2018	
Datou, 2016	
TOTAL TIMES	NIA BROWNS
HON. VERNO	ON S. BRODERICK